

# Exhibit P

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*IN RE* TERRORIST ATTACKS ON SEPTEMBER 11, 2001

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) 03 MDL No. 1570 (GBD)(FM)  
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THOMAS E. BURNETT, SR., *et al.*,

Plaintiffs,

v.

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)  
)  
)  
) No. 03 CV 9849 (GBD)(FM)  
)

AL BARAKA INVESTMENT AND DEVELOPMENT  
CORPORATION, *et al.*,

Defendants.

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**DECLARATION OF THOMAS NELSON**

I, Thomas Nelson, Esquire, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am an attorney who resides in Oregon and am currently a board member of the Al Haramain Islamic Foundation, Inc. (“AHIF USA”). I submit this declaration in support of AHIF USA’s response to the plaintiffs’ motion to compel.

2. As a board member of AHIF USA, I had no involvement with the activities of the Al-Haramain Islamic Foundation (Saudi Arabia) (“Al Haramain Saudi Arabia”).

3. In June 2004, the government of Saudi Arabia closed Al Haramain Saudi Arabia in response to pressure from the United States. Although I have made several trips to Saudi Arabia since 2004, and have made several requests for documents, I have been unable to obtain any documents relating to Al Haramain Saudi Arabia, other than a few documents that were

already in the possession of other individuals, who had retained personal copies.

A handwritten signature in cursive script, reading "Thomas Nelson". The ink is dark and the signature is fluid.

Thomas Nelson, Esquire

DATED: December 9, 2009